

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

JANET LEIGH FRANKLIN,

Plaintiff,

C.A. NO. 04-1513 GMS

MBNA CORP,

Defendant.

EXHIBIT AND WITNESS LIST AND CERTIFICATE OF SERVICE

Dated: August 18, 2006

**Janet L. Franklin
2199 BIGGS HWY
RISING SUN, MD. 21911
410-658-6843**

DISTRICT OF DELAWARE

Jane T. L. Franklin
Plaintiff

V.
MBNA, Corp. Defendant

Case Number: 04-1513 (GMS)

PRESIDING JUDGE Gregory M. Sleet			PLAINTIFF'S ATTORNEY Pro Se		DEFENDANT'S ATTORNEY Teresa A. Cheek	
TRIAL DATE (S) unknown			COURT REPORTER _____		COURTROOM DEPUTY _____	
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
		8/18	Y		(A) MBNA Group Policy Life Insurance - Issued Feb. 1, 2004	
		8/18	Y		(B) Allied Behavioral Health 5/8/03 - Conversation with Defendant's Human Resources Nurse - Pegge Humphrey	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

Exhibit A

Prudential Financial BENEFITS

2004 JAN 22 PM 1:44

January 08, 2004

806893

Janet Franklin
827 Sabina Ct
Bear, DE 19701

Michelle C Fernandez
Associate Disability Claims Examiner

The Prudential Insurance Company of America
Waiver of Premium
PO Box 482
Livingston, NJ 07039

Phone: (800) 524-0542 Ext: 7463
Fax: (973) 548-7530
Hours: Mon - Fri 8:30 am-4:35 pm

Claimant: Janet Franklin
Control No: 24923
Claim No: 10504672
Date of Birth: 08/25/1948

Dear Ms. Franklin:

We have completed our evaluation of your claim for the continuation of your Group Life Insurance under Group Policy G-24923, issued to MBNA Corporation, Inc.

We have approved your claim in the amount of \$203,400.00, effective February 1, 2004 and premium payments may be discontinued as of that date. This insurance will be continued provided you remain totally disabled in accordance with the provisions of this Group Policy.

Periodically, we will request additional information to determine your eligibility for continued benefits. You have an obligation to submit proof of continued disability when requested by Prudential.

Based on the terms of this Group Policy, your Group Life Coverage will terminate on August 25, 2014, following attainment of age 65.

If you should have any questions regarding your claim, please contact us at the above address or call (800) 524-0542, extension 7463. Any correspondence should include the identifying information shown at the top of this letter.

Sincerely,



Michelle C Fernandez
Associate Disability Claims Examiner

cc: Lisa Link
MBNA Corporation Inc
1100 King Street
Wilmington, DE 19884-0233

Id #: _____

ALLIED BEHAVIORAL HEALTH

Exhibit B

PC

5/8/03

6/8/03

Date and Time	Record progress of case, complications, change in diagnosis, condition on discharge, instructions/interventions to patient, patient response.
5/8/03	AS per cld info release contacted Peggy Humphrey - 2 nurse @ MBNA HR dept. Discussed cld + attendance 3 a process. Was informed cld cannot be placed in another 4 work setting @ MBNA - will be terminated from job w/o - 5 pay a put in place next dept to search for other work 6 options @ MBNA. Discussed consequences for cld. Received 7 report that cld was also verbally abusive / inappropriate 8 in work setting. MS Humphrey to contact therapist RN in future - Sharon Fisher MSS, LCSW
5/15/03	(D) Cld stress consistent. Informed cld of PC above w/ Peggy Humphrey - cld focused on worst possible scenario being helpless including STs w/ plan. Generated ideas for problem solving, getting more info, advocating for self, getting a new job / income. Contracted for safety. Assisted cld in making phone calls to MBNA for above. (A) Cld still fragile esp strength but can be re-directed to focus on strengths & problem solving. (P) Cld to attend tx weekly. Cld to follow safety contract & follow on options above for income & self advocacy. - Sharon Fisher MSS, LCSW
5/22/03	(D) Cld reports trying to contact Rich & Peggy @ HR to clarify what steps MBNA is taking re: cld's status as employee - has not yet gotten response back Cld anxiously & ruminations still frequent & intense sleep - cld's 1st choice is to return to work in another dept. Discussed options for cld re: work and/or disability. Conducted EMDR re: "I'm out of control, not safe" VS "I'm safe & in control re: MBNA and childhood issue. Able to do negative cognition & positive to "I'm a cat, I always land on my feet" (A) Cld needs support to stop ANTS & replace w/ positive affirmation. (P) Whenever cld recognizes she is ruminating w/ ANTS cld will reframe to cat metaphor. - Sharon Fisher MSS, LCSW

because
plaintiff
didn't
fit in

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JANET LEIGH FRANKLIN, Plaintiff,

v.

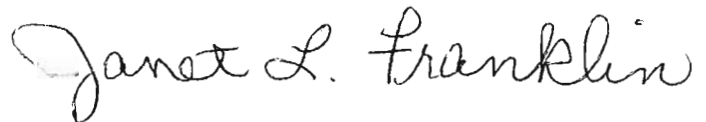
C.A. No. 04-1513 CMS

MBNA CORP, Defendant.

NOTICE OF SERVICE

I hereby certify, that on August 18, 2006, two copies of the following where sent: Plaintiff's EXHIBIT AND WITNESS LIST which included Exhibits A, B. . To the Defendant's Attorney's and Clerk of the Court, via U.S. First Class Mail, postage prepaid by the following *pro se* person of record:

Sincerely Yours,

A handwritten signature in cursive script that reads "Janet L. Franklin".

Dated: April 18, 2006

JANET LEIGH FRANKLIN
2199 BIGGS HWY.
RISING SUN, MD. 21911
410-658-6843